

EXHIBIT A

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Reggiani's Second Amended Answer	Language from Patent Claim	Alleged Withheld Reference
<p><u>Paragraph 47 (Dkt. 38) (emphasis added):</u></p> <p>“At least to the extent Signify claims that Reggiani's products infringe claim 1 of the '138 patent, the WO 99/31560 publication describes ‘<i>an illumination apparatus having at least one LED and at least one controller coupled to the at least one LED and configured to receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage, the at least one controller further configured to provide power to the at least one LED based on the power-related signal.</i>’ See, e.g., WO 99/31560 at pages 30-34 and Figures 6-14. For example, the WO 99/31560 publication <i>inter alia</i> discloses or renders obvious the limitation that the ‘controller’ be ‘configured to receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage.’ See, e.g., WO 99/31560 at pages 30 34, and Figures 6-14.”</p>	<p><u>Claim 1 of the '138 Patent (Dkt. 45-2, Ex. B):</u></p> <p><i>“1. An illumination apparatus, comprising:</i></p> <p><i>at least one LED; and</i></p> <p><i>at least one controller coupled to the at least one LED and configured to receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage, the at least one controller further configured to provide power to the at least one LED based on the power-related signal.”</i></p> <p>(See Col. 24-25)</p>	<p><u>WO 99/31560 publication (Dkt. 41-2):</u></p> <p>The quoted language in Reggiani's Second Amended Answer (Dkt. 38 at ¶ 47) does <u>not</u> appear in the WO 99/31560 publication.</p> <p>Rather, the quoted language in Reggiani's Second Amended Answer (Dkt. 38 at ¶ 47) is <i>actually</i> from Claim 1 of the '138 Patent, as shown in the middle column.</p> <p><u>Reggiani's Opposition Brief (Dkt. 43):</u></p> <p>“First, a proper reading of Reggiani's allegations makes it clear that Reggiani was not implying that the references contained the actual language of the claims word for word, as Signify suggests.” (Page 11)</p>

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Reggiani's Second Amended Answer	Language from Patent Claim	Alleged Withheld Reference
<p><u>Paragraph 53 (Dkt. 38) (emphasis added):</u></p> <p>“At least to the extent Signify claims that Reggiani’s products infringe claim 11 of the ’559 patent, the US 2002/0176262 publication discloses each limitation of claim 11 in, <i>inter alia</i>, abstract, Figs. 2 and 3, and paragraphs [0016] – [0024]. The US 2002/0176262 publication is directed to a ‘power supply for an LED light source which comprises a power converter operable to provide regulated power to LEDs including LED current and LED voltage.’ See, e.g., Figs. 2 and 3, and paragraphs [0016] – [0024]. The power supply disclosed in the US 2002/0176262 publication also includes ‘a switch operable to control a flow of LED current through the LED light source.’ See, e.g., Fig. 3 and paragraphs [0016] – [0024]. The power supply disclosed in the US 2002/0176262 publication also includes ‘a voltage sensor operable to sense the LED voltage applied to the LED light source, said voltage sensor including an [sic] differential amplifier, and means for adjusting a gain of said differential amplifier.’ See, e.g., Fig. 3 and paragraphs [0016] – [0024]. Finally, the ‘LED control switch is further operable to clamp a peak of the LED current during an initial loading stage of the LED light source.’ See, e.g., Fig. 3 and paragraphs [0016] – [0024].”</p>	<p><u>Claim 11 of the ’559 Patent (Dkt. 45-3, Ex. C)</u></p> <p>“11. A power supply for an LED light source, said power supply comprising:</p> <p><i>a power converter operable to provide a regulated power including a LED current and a LED voltage;</i></p> <p><i>an LED control switch operable to control a flow of the LED current through the LED light source; and</i></p> <p><i>a voltage sensor operable to sense the LED voltage applied to the LED light source, said voltage sensor including</i></p> <p><i>an differential amplifier, and</i></p> <p><i>means for adjusting a gain of said differential amplifier,</i></p> <p><i>wherein said LED control switch is further operable to clamp a peak of the LED current during an initial loading stage of the LED light source.”</i></p> <p>(See Col. 7)</p>	<p><u>US 2002/0176262 publication (Dkt. 41-3):</u></p> <p>The quoted language in Reggiani's Second Amended Answer (Dkt. 38 at ¶ 53) does <u>not</u> appear in the US 2002/0176262 publication.</p> <p>Rather, the quoted language in Reggiani's Second Amended Answer (Dkt. 38 at ¶ 53) is <i>actually</i> from Claim 11 of the ’559 Patent, as shown in the middle column.</p> <p><u>Reggiani’s Opposition Brief (Dkt. 43 at 11):</u></p> <p>“First, a proper reading of Reggiani’s allegations makes it clear that Reggiani was not implying that the references contained the actual language of the claims word for word, as Signify suggests.” (Page 11)</p>